

Exhibit 1
Stipulation

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
AH LIQUIDATION, INC., <i>et al.</i> , ¹	Case No. 21-10883 (CTG)
Debtors.	(Jointly Administered)
DRIVETRAIN LLC, in its capacity as LIQUIDATING TRUSTEE for the LIQUIDATING TRUST OF AH LIQUIDATION, INC., AH IP LIQUIDATION, INC., RM LIQUIDATION INC., BP LIQUIDATION, INC., and QAA LIQUIDATION, INC. ,	Adv. No. 22-50392 (CTG)
Plaintiff,	
v.	
DAVID FANN, PAUL COX, STEPHEN WOODY, HUMBERTO ANTUNES, and JOSEPH MCGUIRE,	
Defendants.	

**STIPULATION REGARDING BRIEFING ON HUMBERTO ANTUNES’
MOTION TO DISMISS PLAINTIFF’S COMPLAINT**

Drivetrain, LLC, in its capacity as liquidating trustee (the “Liquidating Trustee” or “Plaintiff”) for the Liquidating Trust² as successor in interest to the debtors, AH Liquidation, Inc. (f/k/a Avadim Health, Inc.), AH IP Liquidation, Inc. (f/k/a Avadim Health IP, Inc.), RM

¹ The Debtors, along with the last four (4) digits of each Debtor’s federal tax identification number are: AH Liquidation, Inc. (8411); AH IP Liquidation, Inc. (7594); BP Liquidation Corp. (6483); QAA Liquidation, Inc. (5613); and RM Liquidation, Inc. (0430). A complete list of each of the Debtors in these Chapter 11 Cases may be obtained via the Bankruptcy Court at <https://ecf.deb.uscourts.gov/cgi-bin/login.pl> with a Public Access to Court Electronic Records (“PACER”) account, which may be obtained at <https://pacer.uscourts.gov>.

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Combined Plan and Disclosure Statement (defined herein).

Liquidation, Inc. (f/k/a Relion Manufacturing, Inc.), BP Liquidation Corp. (f/k/a Bionome Properties Corp), QAA Liquidation, Inc. (f/k/a Quality Assurance Associates, Inc.)³ (collectively, the “Plaintiffs”), through its attorneys, and Humberto Antunes (the “Defendant”), through his attorneys, hereby stipulate and agree as follows:

1. Plaintiff shall have until March 6, 2023 to file its response (the “Response”) to Defendant’s Motion to Dismiss Plaintiff’s Complaint Pursuant to Rules 12(b)5) and 12(b)(6) (the “Motion to Dismiss”);

2. Defendant shall have until March 20, 2023 to file his reply to Plaintiff’s Response;

3. This extension is without prejudice to the rights of any party, including the right to agree to further extensions of time for the filing of the answer or other response, or the rights of Plaintiff to seek further extensions of time from the Court to answer, move or otherwise respond to the Motion to Dismiss, and Defendant’s right to oppose any such requests by the Plaintiff.

(Signature page follows)

³ See D.I. 283 reflecting the change of name for each of the Debtors following the sale of certain assets pursuant to a Stalking Horse APA approved at D.I. 239.

Dated: December 21, 2022

Dated: December 21, 2022

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